

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	11 Civ. 0691 (LAK)
	:	
STEVEN DONZIGER, <i>et al.</i> ,	:	
	:	
Defendants.	:	
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**NOTICE OF CHEVRON CORPORATION'S  
MOTION FOR LEAVE TO ADD DOCUMENTS PRODUCED BY DONALD MONCAYO  
TO THE TRIAL RECORD**

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PLEASE TAKE NOTICE that upon the Memorandum of Law filed concurrently herewith, Plaintiff Chevron Corporation respectfully moves for leave to supplement the trial record with the following documents produced by witness Donald Moncayo:

PX #	Date	Exhibit Description	Bates or Source
<b>PX 7077</b>	6/3/2013	Email from P. Fajardo to D. Moncayo re "IMPRIMIR" ["PRINT"], with attachment and an English translation thereof	Moncayo 000748
<b>PX 7087</b>	10/15/2013	Email from P. Fajardo to J. Prieto, J. Saenz, P. Romero, Vanessa, H. Piaguaje, L. Yanza, E. Chavez, M. Garcez, N. Rodriguez, G. Grefa, S. Laverde, and D. Moncayo re "Notificacion y Oficio IEPI" ["IEPI Notice and Official Letter"], with attachment and an English translation thereof	Moncayo 000722
<b>PX 7088</b>	1/21/2013	Email from P. Fajardo to M. Garces, J. Rodriguez, G. Andres, L. Yanza, J. Prieto, J. Saenz, Vanessa, S. Donziger, Pamela, A. Centeno, copying H. Piaguaje, E. Chavez, R. Yumbo, J. Piaguaje, W. Meneses, J. Piaguaje, D. Moncayo, and V. Asimbaya re "EMBARGO" ["ATTACHMENT"], and an English translation thereof	Moncayo 000901

<b>PX 8091</b>	3/30/2013	Email from L. Yanza to L. Yanza, P. Fajardo, M. Machetes, J. Saenz copying V. Asimbaya and D. Moncayo re "Importante" ["Important"], and an English translation thereof	Moncayo 000914
<b>PX 8092</b>	7/1/2013	Email from P. Fajardo to L. Yanza, H. Piaguaje, E. Chavez, W. Meneses, G. Grefa, R. Yumbo, and D. Moncayo re "Washington Post" and an English translation thereof	Moncayo 000743 - Moncayo 000745
<b>PX 8100</b>	10/17/2013	Email from L. Yanza to W. Meneses, E. Payaguaje, R. Aguinda, R. Yumbo, C. Maniguaje, C. Quimontari, D. Moncayo, G. Grefa copying "humjavi64@hotmail.com" re "Fotos, pies de fotos" ["Photos, photo captions"], and an English translation thereof	Moncayo 000698 - Moncayo 000699
<b>PX 8101</b>	8/28/2013	Email from P. Fajardo to H. Piaguaje, E. Chavez, L. Yanza, R. Yumbo, G. Guillermo, D. Moncayo copying M. Garces, N. Rodriguez, S. Laverde, J. Saenz, P. Romero, and Vanessa re "PILAS PILAS" ["GET IT TOGETHER GET IT TOGETHER"], and an English translation thereof	Moncayo 000783

<b>PX 8102</b>	2/28/2013	Email from S. Donziger to D. Moncayo copying P. Fajardo and L. Yanza re "pregunta" ["question"], and an English translation thereof	Moncayo 000788
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Dated: December 6, 2013

New York, New York

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

/s/ Randy M. Mastro

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